

**DRAFT**

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**ENERGY DIVISION**

**Agenda ID 12954  
RESOLUTION E-4651  
June 12, 2014**

**R E S O L U T I O N**

Resolution E-4651. Southern California Edison Company, San Diego Gas and Electric Company, and Pacific Gas and Electric Company request to implement a Plug-In Electric Vehicle Submetering Pilot (PEVSP) in Compliance with Decision 13-11-002.

PROPOSED OUTCOME: This Resolution approves the utilities' Schedule Plug-In Electric Vehicle Submetering Pilot tariff with modifications and requires filing revised tariffs within 14 days.

SAFETY CONSIDERATIONS: Based on the information before us, Schedule Plug-In Electric Vehicle Submetering Pilot does not appear to result in any adverse safety impacts on the facilities or operations of the utilities.

ESTIMATED COST: \$4,179,333 (SCE), \$3,327,333 (PG&E), and \$3,049,333 (SDG&E)

By Advice Letters SCE 2993-E, PG&E 4343-E, and SDG&E 2566-E  
Filed on January 21, 2014.

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**SUMMARY**

Southern California Edison Company ("SCE"), Pacific Gas and Electric Company ("PG&E"), and San Diego Gas and Electric Company ("SDG&E"), or collectively the joint investor-owned utilities ("IOUs") request approval of Schedule PEVSP to implement pilots to demonstrate Plug-In Electric Vehicle Submetering. Schedule PEVSP and its attached Agreements will be modified to comply with the requirements of Decision ("D.") 13-11-002, in which the Commission ordered the implementation of Submetering pilots to understand the requirements of and customer experiences with non-utility plug-in electric vehicle submetering. The IOUs' request to proceed with the pilot is approved.

**BACKGROUND**

D.11-07-029 in Rulemaking (“R.”) 09-08-009 established requirements for the three large electric investor-owned utilities, SCE, PG&E, and SDG&E, to develop rules to incorporate customer-owned submeters into their billing and metering system for Plug-In Electric Vehicles (“PEV”). In response, the IOUs developed a draft report, Strawman for Plug-In Electric Vehicle Submetering Protocol.

D.13-11-002 modified the PEV Submetering Protocol requirements set forth in D.11-07-029, adopting the Energy Division Staff PEV Submetering Roadmap (included as Attachment 1 to the Decision) for a two-phase pilot project.

Ordering Paragraphs 2, 3, and 6 of D.13-11-002 require the IOUs to submit a Tier 2 advice letter with seven items, which were respectively filed as follows:

Ordering Paragraph, Item	Attachment to AL, Title	# in Res.
Not explicitly ordered by D.13-11-002	A, Schedule Plug In Electric Vehicle Submetering Pilot (“PEVSP”) Phase 1 Utility Pro Forma Tariff	1
OP 2, Customer Enrollment Form	A, Customer Enrollment Agreement-Electric Vehicle Submetering Pilot (Phase 1)	2
OP 2, MDMA Registration Form	A, EV Submeter Pilot Phase 1 Submeter MDMA Registration Agreement	3
OP 2, Metering Requirements provided by Energy Division to the IOUs	A, Attachment 1 to MDMA Registration Agreement, Performance Standards for Metering and Meter Data Management Agents	4
OP 2, MDMA Service Requirements		
OP 2, Draft versions of the data format template	A, Attachment 2 to MDMA Registration Agreement, Data Reporting and Transfer Requirements	5
OP 3, Preliminary budget for the pilots	B, Preliminary Pilot Program Budget for each IOU	6
OP 6, Timeline for the submetering pilot evaluation process	C, Pilot Evaluation Process Timeline	7

This resolution reviews these documents for compliance with D.13-11-002 and refers to them with the numbering convention above.

## **NOTICE**

Notice of SCE AL 2993-E, PG&E AL 4343-E, SDG&E AL 2566-E (“Joint AL”) was published in the Commission’s Daily Calendar. The IOUs state that a copy of the Advice Letter were mailed and distributed in accordance with General Rule 3.14 of the Commission’s General Order 96-B. The IOUs assert that it distributed the AL to the service lists of R.09-08-009 and R.13-11-007 to consider Alternative-Fueled Vehicle Programs, Tariffs, and Policies.

## **PROTESTS/COMMENTS**

The Joint Advice Letter received protests from ChargePoint Inc. (“ChargePoint”), Glen Canyon Corporation (“Glen Canyon”), Green Power Institute/Community Environmental Council (“GPI/CEC”), and Marin Clean Energy (“MCE”). The Joint AL received a timely response from the Office of Ratepayer Advocates (“ORA”). Protests and responses were received timely on February 10, 2014. The Joint IOUs filed replies<sup>1</sup> to protests on February 18, 2014.

This section orders protests according to the protest’s corresponding document attached to the AL. For each document, we first summarize protests that are relevant to overall pilot policies and objectives and second list protests that recommend minor or technical clarifications to specific terms or conditions.<sup>2</sup> The Discussion section of this resolution contains the merit and settlement of each protest using the same document numbering as shown in the table above.

### **1. Schedule PEVSP Phase 1 Utility Pro Forma Tariff**

#### *Unbundled Customer Eligibility*

MCE protests that the proposed tariff’s exclusion of Community Choice Aggregation (“CCA”) customers would violate the competitive neutrality requirements of state law and D.12-05-037.<sup>3</sup> MCE asserts that pursuant to Assembly Bill 117 the IOUs are obligated to serve as MDMA’s to CCAs and “...have no authority to refuse providing metering services necessary to participate” in the pilot. MCE cites P.U. Code 707(a)(4)(A) enacted through

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<sup>1</sup> PG&E filed a reply separately from the Joint IOUs’ reply to address MCE’s protest.

<sup>2</sup> ChargePoint Protest, p. 9-13 and ORA Protest, p. 2-6.

<sup>3</sup> Protest of MCE (“MCE Protest”), February 10, 2014, p. 1.

Senate Bill 790 to assert that allowing the IOU to provide a program that a CCA could not would be anti-competitive and result in cross-subsidization. To this point, MCE cites D.12-05-037 to assert that since the pilots are supported by all ratepayers via the Electric Program Investment Charge ("EPIC"), all ratepayers should be allowed to participate and benefit from the submetering pilot.<sup>4</sup>

ORA disagrees with IOUs' the justification that CCA customers "may add little value to the pilot study" and asserts that their exclusion would skew estimates for PEV submetering demand. ORA recommends for CCA customers to be included within the pilot.<sup>5</sup>

For CCA customers, PG&E replied to MCE's protest explaining that third parties, not IOUs, are permitted to operate as Submeter MDMAs in the pilot. PG&E describes billing process issues specific to MCE customers that would potentially result in costs from modifications to the unbundled service customer billing system and delays from subtractive billing. PG&E notes that MCE has not notified the Commission of its intent to participate in the pilot. PG&E replies that using EPIC funds for submetering can meet their objectives regardless of CCA customer participation and states that the results will be made available to all stakeholders consistent with the non-discrimination requirements of EPIC.<sup>6</sup>

For Direct Access ("DA") customers, IOUs explain that the intent to exclude DA customers originated from complexities in accounting for the SB 695 cap and obtaining permission from the Electric Service Provider ("ESP") and MDMA to participate. Given DA customer interest and a Commission finding of merit in their inclusion, IOUs were willing to support participation if (1) the DA customer's existing load includes their PEV load and (2) if the ESP and MDMA consent to their customer's participation and the terms of the pilot.<sup>7</sup>

The Commission discusses these matters in detail within the "Schedule PEVSP" section of the Resolution.

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<sup>4</sup> MCE Protest, p. 2.

<sup>5</sup> ORA Response, p. 2-3.

<sup>6</sup> Reply of PG&E, February 18, 2014, p. 2-3.

<sup>7</sup> IOU Reply, p. 8.

*Net Energy Metering Customer Eligibility*

Glen Canyon and GPI/CEC disagree with the IOUs' proposed cap on the number of Net Energy Metering ("NEM") customers to 10% of the 500 eligible pilot participants per utility.<sup>8</sup> Instead, Glen Canyon recommends submetering NEM generation to simplify accounting.<sup>9</sup>

IOUs reply that it is justifiable to reduce the NEM participation cap because NEM customers, which account for 3% of the IOUs' total customer population, would be over-represented in the pilot. IOUs reply to GPI/CEC's protest on the proposed budget for billing NEM customers, stating that they determined reducing the cap could manage the higher labor costs of manual subtractive NEM billing while adequately measuring NEM customer experience. IOUs disagree with Glen Canyon's recommendation to submeter NEM generation for cost reasons.<sup>10</sup>

*Protests or clarifications on terms and conditions*

- a) Reference to "Primary load" at p. 1
- b) Incentive Payment termination/substitution at p. 2
- c) Enrollment Period Duration at p. 3
- d) Disenrollment and Change of address at p. 4
- e) Ineligibility for Direct Pay Plan and Level Pay Plan at p. 4
- f) Utility-specific safety requirements at p. 4
- g) Limitation of 5 Submeters for each Primary Meter at p. 4
- h) Validation, Editing, & Estimation in Submeter MDMA definition at p. 4
- i) Definition of Primary Meter at p. 5
- j) Reference to "Summary Bill" at p. 5

The IOUs were amenable to making typographic and other minor changes according to Energy Division direction.<sup>11</sup>

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<sup>8</sup> Protest of GPI/CEC ("GPI/CEC Protest"), February 10, 2014, p. 2 and Glen Canyon Protest, p. 2.

<sup>9</sup> Glen Canyon Protest, p. 2.

<sup>10</sup> IOU Reply, p. 3-4.

<sup>11</sup> IOU Reply, p. 8.

## 2. Customer Enrollment Agreement;

### *IOU Assistance in Customer Recruitment*

Glen Canyon suggests that the IOUs are in the best position to identify submetering pilot participants at the lowest overall cost.<sup>12</sup> Similarly, ORA recommends that the IOUs provide customer recruitment guidelines based on location and demography to “prevent unintended recruitment bias.”<sup>13</sup>

The IOUs did not reply to this protest.

### *Equal Recruitment among Customer Sectors*

ORA is concerned that the lack of an incentive specific to residential customers would result primarily in non-residential customers participating. ORA suggests that MDMAs be encouraged to evenly recruit customers in both the residential and commercial sectors to achieve more representative results. We reject this protest as the Decision recognized the potential for submetering to generally benefit other types of customers if it could be demonstrated in any one sector.<sup>14</sup>

### *Protests or clarifications on terms and conditions*

- a) Description of Survey/Testing at p. 1
- b) Description of Installation at p. 2
- c) Description of Participant responsibilities at p. 2
- d) Description of disregarded information at p. 3
- e) Ineligibility for other IOU programs at p. 4
- f) Reference to IOU website at p. 4
- g) Instructions to customer at p. 1
- h) MDMA release of utility liability at p. 4

The IOUs were amenable to making typographic and other minor changes according to Energy Division direction.<sup>15</sup>

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<sup>12</sup> Glen Canyon Protest, p. 2.

<sup>13</sup> ORA Response, p. 5.

<sup>14</sup> D.13-11-002, p. 27-28.

<sup>15</sup> IOU Reply, p. 8.

### 3. EV Submeter Pilot Phase 1 Submeter MDMA Registration Agreement

*Protests or clarifications on terms and conditions*

- a) IOU or Energy Division Standards at p. 2
- b) Energy Division delegation of review at p. 3
- c) Daily reporting at p. 4
- d) Submeter Testing and Calibration at p. 4

The IOUs were amenable to making typographic and other minor changes according to Energy Division direction.<sup>16</sup>

### 4. Performance Standards for Metering and Meter Data Management Agents

*Protests or clarifications on terms and conditions*

- a) Transfer testing at p. 11
- b) Process updates at p. 12
- c) Meter System Testing at p. 13

The IOUs were amenable to making typographic and other minor changes according to Energy Division direction.<sup>17</sup>

### 6. Preliminary Pilot Program Budget for each IOU

*Estimation of Preliminary Budget*

GPI/CEC protest that the IOUs' budget for the pilot, including the Customer Experience Evaluation and Manual NEM Billing Data are "exorbitant" and not sufficiently justified. GPI/CEC requests that the IOUs provide additional information detailing their budgets.<sup>18</sup>

IOUs reply that GPI/CEC's budget analysis misrepresents utility costs by not accounting for the three year length of the pilot and illustrate labor requirements

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<sup>16</sup> IOU Reply, p. 8.

<sup>17</sup> IOU Reply, p. 8.

<sup>18</sup> GPI/CEC Protest, p. 4.

for PG&E. IOUs claim that the labor rates for a third party evaluator is an approximation for Request for Proposal bids for a similar scope.

*Compensation of Non-Recurring Costs for Submeter MDMAs*

ChargePoint protests that the AL's proposal to fund participating Submeter MDMAs is inconsistent with D.13-11-002's requirement that the utility propose "a reasonable per customer incentive payment."<sup>19</sup> ChargePoint asserts that the proposal is "fundamentally flawed to the extent that it does not include an additional incentive payment to compensate participating EVSPs/MDMAs for non-recurring costs" to create an accounting system, test equipment, recruit participants, and manage the pilot. Instead, ChargePoint requests that the Commission authorize one-time payments through a request for proposals ("RFP") or application process.<sup>20</sup>

The IOUs reply that the EVSP Coalition's<sup>21</sup> comments filed in Phase 3 of R.09-08-009 conflict with the protest, citing a statement that third parties would invest in submetering because the benefits "justify the cost of implementation" to develop technology and services.<sup>22</sup> In addition, the IOUs disagree that the non-recurring costs support fundamental functions of EVSP businesses that are not unique to the submetering pilots and offer "no established direct benefits to ratepayers." Second, IOUs believe that selectively funding the non-recurring costs for certain companies would provide an unfair competitive advantage to those that do not receive ratepayer funding. Third, IOUs assert that providing ratepayer funding for accounting systems would counter D.13-11-002's recommendation to manually process submeter billing to avoid the cost of upgrades.<sup>23</sup>

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<sup>19</sup> D.13-11-002 at 40-41.

<sup>20</sup> Protest of ChargePoint to Joint AL ("ChargePoint Protest"), February 10, 2014, p. 6.

<sup>21</sup> ChargePoint was one of three members in the EVSP Coalition.

<sup>22</sup> Comments of the EVSP Coalition on the Joint Utilities' Submetering Protocol Roadmap Report per the January 31, 2012 ALJ Ruling, p. 9.

<sup>23</sup> IOU Reply, p. 3.



*Compensation of Recurring Costs for Submeter MDMAs*

Noting that D.13-11-002 was silent regarding how incentives should be paid, ORA recommends that the enrollment incentive be shared equally between the Submeter MDMA and the customer, rewarding the customer if the Submeter MDMA does nothing to recruit the customer into participation.<sup>24</sup> Glen Canyon agrees that the IOUs' proposed incentive amount for MDMA services, as specified, is "fair and reasonable."<sup>25</sup> ChargePoint does not protest the enrollment incentive and monthly recurring payment for MDMA services.<sup>26</sup>

*Non-Compensation Terms Affecting Submeter MDMAs*

Glen Canyon asserts that the proposed "business terms for incentive payments are neither industry standard nor favorable [for the success of the pilot]." Instead, Glen Canyon recommends that contractual terms be subject to final negotiation between the Submeter MDMA and the IOU.<sup>27</sup>

ORA recommends that the enrollment incentive be paid to the Submeter MDMA after three successful billing cycles instead the IOUs' proposal of 60 days after the date of each customer enrollment in order to motivate the MDMAs.

IOUs reply that these suggestions do not comport with D.13-11-002, which directed the IOUs to create a "registration form that will allow any Submeter MDMA to participate." The IOUs reason that Schedule PEVSP is an open access tariff that avoids the length or complexity associated with negotiations or a Request for Proposals, provides business terms and requirements needed for non-discriminatory participation.<sup>28</sup>

*Availability of Commercial PEV Rates*

Chargepoint asserts that the pilot must include PEV rates for commercial customers in PG&E's and SDG&E's territories. ChargePoint is concerned that,

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<sup>24</sup> Response of ORA to Joint AL ("ORA Response"), February 10, 2014, p. 6.

<sup>25</sup> Protest of Glen Canyon to Joint AL, ("Glen Canyon Protest"), February 10, 2014, p. 1.

<sup>26</sup> ChargePoint Protest, p. 6.

<sup>27</sup> Glen Canyon Protest, p. 2

<sup>28</sup> IOU Reply, p. 7.

absent access to commercial PEV charging rates, participation will be limited because non-PEV rates in these territories may increase the otherwise applicable cost. ChargePoint recommends various incentives for commercial customers to overcome the lack of access to commercial rates including setting energy rates at a discounted or zero cost to the customer.<sup>29</sup>

IOUs reply by stating that rate design is not within the scope of the pilot and are being addressed in other venues. IOUs disagree with Chargepoint's suggestion to fully discount energy for commercial customers. However, IOUs suggest that a flat payment of \$20/month using a direct mechanism may be a more appropriate and expedient way to incent PG&E and SDG&E commercial customers.<sup>30</sup>

## **DISCUSSION**

On January 21, 2014, the Joint IOUs filed Advice Letter ("AL") SCE AL 2993-E, PG&E AL 4343-E, SDG&E AL 2566-E providing information required by the Commission in Ordering Paragraphs 2, 3, and 6 of D.13-11-002. In addition, the AL establishes a pro-forma tariff, Schedule Plug-In Electric Vehicle Submetering Pilot ("Schedule PEVSP"), to support the implementation of the pilot.

Specifically, the IOUs propose the establishment of the following tariff and agreements and request approval of a budget and evaluation timeline:

1. Schedule Plug In Electric Vehicle Submetering Pilot ("PEVSP") Phase 1 Utility Pro Forma Tariff;
2. Customer Enrollment Agreement- Electric Vehicle Submetering Pilot (Phase 1);
3. EV Submeter Pilot Phase 1 Submeter MDMA Registration Agreement;
4. Performance Standards for Metering and Meter Data Management Agents;
5. Data Reporting and Transfer Requirements;
6. Preliminary Pilot Program Budget for each IOU
7. Pilot Evaluation Process Timeline

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<sup>29</sup> ChargePoint Protest, p. 8.

<sup>30</sup> Reply of IOUs ("IOU Reply"), February 18, 2014, p. 6.

The IOUs note that the forms filed are generic versions and that they will be revised to include IOU-specific information, and resubmitted as Tier 1 Advice Letters for Commission approval.

**Energy Division evaluated the Submetering Pilot documents based on the following criteria:**

- Consistency with D.13-11-002, which in Ordering Paragraphs 2, 3, and 6 required the Investor Owned Utilities to file items to implement the Submetering Pilots
- Consistency with the Zero-Emission Vehicles Action Plan
- Cost Reasonableness
- Public Safety

**Consistency with D.13-11-002**

***1. Schedule PEVSP Phase 1 Utility Pro Forma Tariff***

While the creation of Schedule PEVSP was not specifically ordered by D.13-11-002, the IOUs developed a pro forma tariff that allows otherwise-ineligible customers to access PEV or commercial rates through a Submeter MDMA. The Commission considers parties' protests to the following terms in Schedule PEVSP. Party protested 12 items in the PEVSP Tariff Schedule: (a) Unbundled Customer Eligibility at page 1; (b) Reference to primary load at page 1; (c) Incentive payment termination/substitution at p. 2; (d) NEM account cap at page 3; (e) Enrollment period duration at page 3; (f) Disenrollment and change of address at page 4; (g) Ineligibility for direct pay plan and level pay plan at page 4; (h) Utility-specific safety requirements at page 4; (i) Limitation of 5 submeters for each primary meter at page 4; (j) Validation, Editing, and Estimation by Submeter MDMA at page 4; (k) Definition of Primary Meter at page 5; and (l) Reference to "Summary Bill" at page 5.

***(a) Unbundled Customer Eligibility at page 1***

Marin Clean Energy (MCE) and ORA expressed concern that Schedule PEVSP excludes CCA customers from participating. MCE argued that excluding CCA customers from the pilot would violate the legislation establishing CCAs (SB 970) and would be inconsistent with the principles of the EPIC program. SB 970, as MCE argues, requires that CPUC support fair competition between CCAs and

IOUs. EPIC funding is required to benefit all ratepayers, not a “sub-segment of ratepayers.”<sup>31</sup>

In its response to protests dated February 18th, PG&E addressed MCE’s concern based on two possible interpretations of MCE’s request. PG&E thought it was unclear whether MCE was requesting that it be allowed to be an MDMA, or whether it would like its customers to be able to participate in the pilot like bundled ratepayers. PG&E did not dispute MCE’s ability to be an MDMA, but argued against MCE’s customers participating in the pilot. PG&E thought that the meter data reporting requirements authorized by D.13-11-002 would complicate their participation in the pilot. D.13-11-002 requires that MDMAAs submit their submeter data within 3 days, while utilities are required to submit billing data to the CCAs within 3 days, making it difficult for utilities to send timely billing data to CCA in cases where a submeter is used.

PG&E’s dichotomy of options for CCA participation is useful for determining exactly what role a CCA and its customers will play in this pilot. In regards to being an MDMA, MCE did miss the original “notice of intent” deadline, however, this deadline was not intended to exclude parties from participating in the pilots as MDMAAs. The registration deadline in the decision (April 1) was intended to serve as the formal registration deadline, while the Jan. 3 deadline was intended to facilitate communication between the utilities and potential MDMAAs. If Decision 13-11-002 intended for “notice of intent” deadline to be binding, the April 1<sup>st</sup> registration deadline would not have been necessary. MCE may still apply to be an MDMA provided it meets the requirements for an MDMA by the registration deadline. MCE argues that prohibiting CCA customers from participating will negatively impact a CCA’s competitive position relative to the utility. We find this argument to be compelling, since submetering would be an additional service that only bundled customers would be able to access. PG&E does not refute CCA’s competitiveness arguments, but rather argues that the participation of CCA customers introduces complexity in bill processing. Submetering in general introduces complexity in bill processing. The purpose of the pilot is to evaluate if the complexity required justify customer-owned submeters is exceeded by the customer benefits of submetering. The complexity identified by PG&E would necessarily need to be addressed if submetering were fully implemented. Under this scenario, CCAs would be

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<sup>31</sup> MCE Protest, p. 2.

unprepared to accommodate submetering, putting CCAs at a competitive disadvantage to the IOU. To further the goals of the pilot and avoid the risk of CCAs finding themselves in a future competitively disadvantageous position, IOUs should include CCA customers in the pilot.

IOUs should revise Schedule PEVSP to allow participation by Community Choice Aggregator customers.

*(b) Reference to "Primary load" at page 1*

ChargePoint is concerned that the reference in the Applicability section to "primary load" may inadvertently exclude certain types of submetered PEV loads. ChargePoint identifies that commercial customers with multiple interval data recording meters or customers whose PEV load is "primary" (i.e. the greatest share of load) on a given meter may be excluded from the pilot with this interpretation. The Commission agrees that the use of "primary load" shall not exclude these cases. Consistent with the Submetering Roadmap<sup>32</sup>, Schedule PEVSP must allow a PEV "to be billed off of a meter installed on the customer-side of the primary customer meter." Eligibility is not contingent upon the number of meters held or the share of a meter's total load associated with PEV charging. A Customer of Record may submeter their PEV load from their primary meter if it is connected or attached to said meter. No changes are necessary to the tariff to implement this clarification.

*(c) Incentive Payment termination/substitution at page 2*

ORA is concerned about the negative effect on the pilot if Submeter MDMAs fail to meet performance requirements and are subject to termination by an IOU petition to Energy Division. ORA suggests that the Commission order IOUs to notify the customer of this termination and to avail them the option to subscribe with an alternate Submeter MDMA. The proposed Schedule PEVSP language is consistent with the MDMA Performance Requirements.<sup>33</sup> However, ORA's suggestion is consistent with the Pilot Participation Period of 12 billing cycles, which continue at the discretion of the customer.<sup>34</sup> If a customer's submetering

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<sup>32</sup> D.13-11-002 Attachment 1, p. 2.

<sup>33</sup> D.13-11-002 Attachment 1, p. 18-19

<sup>34</sup> D.13-11-002, p. 26 and Attachment 1, p. 12.

service is terminated as a fault of the Submeter MDMA, it is reasonable to allow them to reenroll with an alternative provider.

The IOUs shall notify the customer if submetering service is terminated and allow them to complete the remainder of their Pilot Participation Period subject to completing the requirements to re-enroll with an alternative provider.

*(d) NEM Account Cap at page 3*

GPI/CEC and Glen Canyon protest the proposed reduction of the number of NEM customers eligible to enroll in the pilot from 25% to 10% of the total submeters. The Decision permitted the IOUs to propose to change the limit according to updated NEM/PEV adoption data or cost concerns.<sup>35</sup> We agree for two reasons. The IOU territories generally saw a reduction in the number of NEM/PEV customers from the 2012 Load Research Report, which was the basis for the cap in D.13-11-002. In the 2012 Report, the IOUs reported that NEM customers comprise 21%, <24%, and <25% of PG&E, SCE, and SDG&E's single metered PEV customers, respectively.<sup>36</sup> As of August 2013, the IOUs report that NEM customers comprise 18%, 25%, and 17% of PG&E, SCE, and SDG&E's single metered PEV customers, respectively.<sup>37</sup> Furthermore, the IOUs' budget estimates suggest that manual billing for each NEM customer would cost 4 to 13 times the amount for non-NEM customers.

Based on more recent adoption levels and in order to contain costs, it is reasonable for the IOUs to reduce the NEM enrollment limit to 10% (150) of total eligible submeters.

*(e) Enrollment Period Duration at page 3*

ORA identifies that the Enrollment Period is incorrectly stated as 5 months. Decision 13-11-002 established a 6 month enrollment period.<sup>38</sup>

The IOUs shall correct the length of the Enrollment Period to 6 months.

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<sup>35</sup> D.13-11-002, p. 27.

<sup>36</sup> Joint IOU Electric Vehicle Load Research Report, December 28, 2012, p. 13, 25, and 42.

<sup>37</sup> Joint IOU Electric Vehicle Load Research Report, January 31, 2014, p. 20, 54, and 82.

<sup>38</sup> D.13-11-002, p. 29 and Attachment 1, p. 13.

*(f) Disenrollment and Change of address at page 4*

Chargepoint requests 10 days instead of 5 days to report a drop-out or include an exception to accommodate customers that move without notifying the Submeter MDMA. The Decision requires Submeter MDMA's to report these types of participants to the utility "as soon as possible prior to the start of the next billing period."<sup>39</sup> Pursuant to the pilot's guiding principle to support collaboration between stakeholders,<sup>40</sup> allowing 10 days for this report is reasonable.

Chargepoint is reasonable to request that the utility share information on the customer's status. However, to protect customer privacy the IOUs shall limit the notification to information that is pertinent to the customer's participation in the pilot.

The IOUs shall allow 10 days for an MDMA to report a drop-out or change of address, and include an option that allows customers who change their address to continue in the pilot.

ORA asserts that this term is unclear whether customers that change their address will be permitted to resume submeter service at their new location. The term only discusses the reinstatement of the otherwise applicable tariff of the primary meter for all load. The Decision requires that a relocated customer resume submeter service coincident with the start of the next billing period.<sup>41</sup>

The IOUs shall revise the tariff to reflect this option for customers that move.

*(g) Ineligibility for Direct Pay Plan and Level Pay Plan at page 4*

ORA and Chargepoint request the clarification or elimination of the term precluding customer participation in Direct Payment or Level Pay Plan programs. The IOU's reply that these exclusions are necessary to complete submetered billing via the Remittance Model and to accurately account the customer's monthly bill, respectively.<sup>42</sup> While we recognize that the Level Pay Plan adds complexity to the billing system. With respect to Direct Pay Plan, we

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<sup>39</sup> D.13-11-002 Attachment 1, p. 16.

<sup>40</sup> D.13-11-002, p. 19.

<sup>41</sup> D.13-11-002 Attachment 1, p. 16.

<sup>42</sup> IOU Reply, p. 5. The Remittance Model was described on page 5 of Attachment 1 of D.13-11-002.

recognize that there may be complexities with implementing the Remittance Model. However, we are reluctant to exclude a potentially large amount of subscribers from the Direct Pay Plan program. We encourage the MDMAs, to work with the IOUs and their customers to ensure that completing remittance payments to the IOU do not result in double payments.

The IOUs shall extend pilot eligibility to Direct Pay Plan customers.

*(h) Utility-specific safety requirements at page 4*

Chargepoint requests the deletion of the requirement that submeters meet UL safety requirements or “comply with UTILITY’s specific safety requirements.” In the metering requirements sent from Energy Division to the IOUs, submeters are required to comply with UL safety requirements.<sup>43</sup> We find these requirements appropriately ensure the safety of submetering devices.

The IOUs shall remove the reference to “utility specific safety requirements” for submeters.

*(i) Limitation of 5 Submeters for each Primary Meter at page 4*

Chargepoint requests justification or elimination of the limit of 5 submeters per primary meter. This limitation is inconsistent with the Decision’s clarification of Eligibility for Submetering Services, which does not limit the number of submeters a Single Customer of Record may request.<sup>44</sup>

The IOUs shall eliminate the limit of 5 submeters per primary meter.

*(j) Validation, Editing, and Estimation by Submeter MDMA at page 4*

Chargepoint requests revision or elimination of reference to Submeter MDMA’s use of CPUC-approved VEE methods. In the case of the Submetering pilot, the CPUC-approved VEE method was to be determined collaboratively by the IOUs and MDMA’s and be built upon the Strawman PEVSP where possible.<sup>45</sup> Per the

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<sup>43</sup> EV Submeter Pilot Phase 1, Submeter MDMA Registration Agreement, Attachment 1, p. 9.

<sup>44</sup> D.13-11-002, p. 26.

<sup>45</sup> D.13-11-002 Attachment 1, p. 18.



IOU's proposed VEE Performance Standards, MDMAs are not required to meet requirements for Direct Access Customers.<sup>46</sup>

The IOUs shall collaborate with the MDMAs to determine an appropriate method for validating, editing, and estimating interval data, building on the Strawman PEVSP where possible, as required by D.13-11-002.

*(k) Definition of Primary Meter at page 5*

Chargepoint requests amending the definition of primary meter by replacing "the premises" with "the Customer's account" since a customer premise may have more than one primary meter. This request is reasonable and reduces confusion for those sites that have more than one primary meter.

The IOUs shall amend the definition of primary meter by replacing "the premise" with "the Customer's account."

*(l) Reference to "Summary Bill" at page 5*

Chargepoint requests amending the definition of Submeter Billed Amount by replacing "Summary Bill" with "summary of charges related to submetered usage." This request is reasonable in order to avoid confusion.

The IOUs shall amend the definition of 'Submeter Billed Amount' by replacing "Summary Bill" with "summary of charges related to submetered usage."

## **2. Customer Enrollment Agreement**

As ordered in OP 2, of D.13-11-002, the IOUs included a Customer Enrollment Agreement. The Commission considers parties' protests to the following terms in the Submeter MDMA Registration Agreement. Parties protested eight items related to the customer enrollment form: (a) Description of survey/testing at page 1; (b) Description of installation at page 2; (c) description of participating responsibilities at page 2; (d) Description of disregarded information at page 3; (e) Ineligibility for other IOU programs at page 4; (f) Reference to IOU website at page 4; (g) Customer Enrollment Agreement Instructions at page 1; and (h) IOU Assistance in Customer Recruitment.

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<sup>46</sup> Attachment 1, Performance Standards for Metering and MDMAs, Section G, p. 12.

*(a) Description of Survey/Testing at page 1*

Chargepoint requested additional language to describe in detail the customer's potential experience during survey testing. They asked that the following language (in bold) be added to the Paragraph 5 of Section A:

“...In addition, you agree to provide an independent evaluator paid by the Investor owned Utilities (IOUs) with feedback on your experiences with Pilot participation, including enrollment, equipment installation, and billing. **In accordance with the CPUC's instruction, this survey will not be burdensome.** Additionally, you may be required to provide access to your home or facility for the evaluator to perform tests on your submeter. **Such submeter testing is only required of 5% of participating customers. If your submeter is selected for testing, tests will be arranged at a convenient time, and your MDMA may be present....**”<sup>47</sup>

The proposed language is consistent with the structure of the pilot evaluation as described in the Decision.

The IOUs shall include Chargepoint's suggested language to describe the customer's experience during survey testing.

*(b) Description of Installation at page 2*

Chargepoint requested that the participant be obliged to install or “have installed” a submeter to reflect a subcontractor situation. We find that the utility language on this point is intended to indicate that the customer is responsible for the installation of the submeter, and is not intended to indicate that the customer must do it themselves. Chargepoint's proposed language is consistent with the Decision.

The IOUs shall revise the references to submeter installation to reflect the possibility of a subcontractor situation.

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<sup>47</sup> Chargepoint Protest, p. 10-11.

*(c) Description of Participant responsibilities at page 2*

ORA protests that this term gives the customer, in addition to its Submeter MDMA, responsibility for installation and maintenance. They assert that the term is inconsistent with the Decision that states that the Submeter MDMA would have this responsibility.<sup>48</sup> The Agreement's proposed term is consistent with the Decision, which was crafted assuming that the Submeter MDMA may be able to act on behalf of the customer, according to responsibilities established in their customer/MDMA contract. This protest is dismissed.

*(d) Description of disregarded information at page 3*

Chargepoint requested clarification regarding termination such that incomplete or late data be disregarded only in cases where the MDMA's action is cause of the data transmission failure. Chargepoint's language is consistent with the Decision.

The IOUs shall clarify that termination due to late or incomplete data only occur in cases where the MDMA's action is the cause of the data transmission failure.

*(e) Ineligibility for other IOU programs at page 4*

ORA protests that prohibiting customers from participating in other programs that might encourage energy savings such as My Account, Green Button, Budget Assistant, Peak Time Rebate, and Rate Analyzer may discourage them from participating in the submetering pilot. The IOUs' reply focuses on the Level Pay Plan and Direct Pay Plan and does not address the programs previously listed. The IOUs shall allow participation with the other programs because although PEV load accounted by the submeter and associated costs from the PEV time of use rate, the primary meter still will reflect a utility-grade accounting of the customer's total usage.

The utilities shall refine the term to limit participation only from programs that would prevent the completion of subtractive billing.

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<sup>48</sup> D.13-11-002, p. 33.

*(f) Reference to IOU website at page 4*

Chargepoint requests that the utility remove references to terms on its website. Customers should not be subject to searching the utilities' websites in order to determine their participation in the pilot. However, the IOU website is a useful resource for customer's needing to access other relevant tariff information. While the tariff should not direct customers to their website to determine pilot eligibility, the utility may direct pilot participants to their website for broad information relevant to customer accounts and other programs.

The IOUs shall revise the terms to remove the suggestion that customers search the IOU website to determine their eligibility to participate in the pilot.

*(g) Customer Enrollment Agreement Instructions at page 1*

Chargepoint requests the revision of Steps 2-4 of the Customer Enrollment Agreement Instructions to correctly reflect the pilot process. In particular, they ask that the language reflect that the MDMA is responsible for enrolling customers, that customers need not call the IOU to enroll and that EVSE installation will be unnecessary for customers that already have EVSE installed. Chargepoint's recommendations are consistent with Decision13-11-002.

The IOUs shall revise the terms to reflect the most likely expected processes for enrolling customers.

*(h) IOU Assistance in Customer Recruitment*

Glen Canyon and ORA suggested that the IOUs provide the MDMA's assistance in identifying customers to participate in the pilot. The IOUs did not reply to this suggestion. The Decision did not intend for the IOUs to actively participate in customer acquisition and prior to customer enrollment.<sup>49</sup> However, we are compelled by the potential of this recommendation to reduce costs and improve participation.

The IOU may elect to provide non-discriminatory assistance to MDMA's in order to identify PEV customers under two conditions: (1) The IOU maintains its existing obligations to protect customer privacy; and (2) The costs associated with identifying and transmitting this information to MDMA's are de minimis.

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<sup>49</sup> D.13-11-002 Attachment 1, p. 12.

### ***3. Submeter MDMA Registration Agreement***

As ordered in OP 2, of D.13-11-002, the IOUs included a Submeter MDMA Registration Agreement. The Commission considers parties' protests to the following terms in the Submeter MDMA Registration Agreement. Parties protested five items in the registration form: (a) IOU or Energy Division standards at page 2; (b) Energy Division delegation of review at page 3; (c) Daily reporting at page 4; (d) Submeter testing and calibration at page 4; (e) MDMA release of utility liability at page 4.

#### *(a) IOU or Energy Division Standards at page 2*

Chargepoint requests that Submeter MDMAs be held to compliance with "Energy Division" standards for experience, education, and training, instead of "IOU standards." This request is reasonable given that the Notice of Intent and Notice to Participate from Submeter MDMAs are subject to Energy Division review.<sup>50</sup>

The IOUs shall replace "IOU standards" to indicate that the performance standards are "Energy Division standards."

#### *(b) Energy Division delegation of review at page 3*

Chargepoint requests that the Energy Division does not delegate review of the Submeter MDMA registration application to the IOUs to ensure consistency of review. While the Registration Agreement allows for this option, it does not require Energy Division to do so.

The IOUs shall indicate that Energy Division will review the applications to maintain impartiality and consistency for MDMAs operating in multiple IOU territories, and consult with the IOUs if necessary.

#### *(c) Daily reporting at page 4*

Chargepoint asserts that the daily reporting of pilot participants is burdensome and requests its elimination from the Enrollment Reporting requirement. The Decision required daily reporting during the Open Period (but not during the

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<sup>50</sup> D.13-11-002, p. 28 and Attachment 1, p. 14.

Exclusivity Period) in order to ensure that Submeter MDMAAs could enroll as many customers in excess of the number that they had Exclusivity Rights to, while minimizing the potential for rejecting a customer from the pilot if they turned out to be the 501<sup>st</sup> submeter customer.<sup>51</sup> The IOUs' implementation of this daily reporting requirement is reasonable and no changes to the Agreement are necessary.

*(d) Submeter testing and calibration at page 4*

Chargepoint asserts that the Submeter MDMAAs should not be required to provide compliance and testing data to the IOUs if they have otherwise complied with the application process and demonstrating consistency with the Performance Standards for Metering and MDMAAs. As discussed previously with respect to Meter System Testing, this term is consistent with the Decision.<sup>52</sup>

Chargepoint requests that MDMAAs should not be "required to obtain access from their participants" for testing and calibration because the customer and the utility have a contract that includes this requirement. Chargepoint is referring to the last paragraph of Section A of the Customer Enrollment Agreement.<sup>53</sup> A customer's permission of MDMA access to their submeter is prerequisite in the Customer Enrollment Agreement. However, the Decision requires that "a member of the Submeter MDMA [be] present" during field testing if the submeter is selected.<sup>54</sup> The MDMA's presence during testing by the third party evaluator will be necessary to gain access to the customer's submeter and will ensure that technical questions will be answered.

The IOUs shall clarify the requirement as follows: By virtue of a customer's enrollment with submeter service by the IOU, the Independent Evaluator and Submeter MDMAAs may obtain access from their participants for testing and calibration, if selected as part of the evaluation.

The IOUs shall clarify the testing and calibration requirements of MDMAAs to maintain consistency with the terms of Customer Enrollment Agreement.

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<sup>51</sup> D.13-11-002, p. 29-30.

<sup>52</sup> D.13-11-002, p. 33 and Attachment 1, p. 18.

<sup>53</sup> Customer Enrollment Agreement – Electric Vehicle Submetering Pilot (Phase 1), p. 1.

<sup>54</sup> Id.

*(e) MDMA release of utility liability at page 4*

The IOUs included the following release of liability language on page 4 of the Customer Enrollment form: ““I (Submeter MDMA), hereby release, hold harmless, and indemnify the Utility from any liability, claims, demand, causes of action, damages, or expenses resulting from the use of customer information obtained pursuant to this authorization and from the taking of any action pursuant to this authorization, including rate changes.” Chargepoint requests clarification that the action of an MDMA releasing the utility from liability be qualified with the following language added to the end of the sentence above: “...provided such Utility action is consistent with applicable CPUC orders, tariffs and regulations.” Chargepoint’s language adds more clarity to the meaning of this requirement.

The IOUs shall add Chargepoint’s suggested modification to the language of the utility release of liability.

***4. Performance Standards for Metering and Meter Data Management Agents***

As ordered in OP 2, of D.13-11-002, the IOUs included Performance Standards for Metering and Meter Data Management Agents, which are based largely on requirements submitted to them by Energy Division. These are included as Attachment 1 to the Submeter MDMA Registration Agreement. The Commission considers parties’ protests to the following terms in the Performance Standards for Metering and MDMA. Parties protested the following three items related to metering requirements: (a) transfer testing at page 11; (b) process updates at page 12; and (c) metering system testing at page 13.

*(a) Transfer testing at page 11*

Chargepoint requests clarification that transfer “testing” occurs at the initiation of the pilot and “as necessary” thereafter. This request is consistent with the IOUs’ proposed “Registration Process” that requires submission of the formatted data file to pass a data qualification test prior to the start of the pilot.<sup>55</sup>

The IOUs shall clarify that transfer testing occur during the Submeter MDMA Registration Process and thereafter as necessary.

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<sup>55</sup> EV Submeter Pilot Phase 1, Submeter MDMA Registration Agreement, p. 3.

*(b) Process Updates at page 12*

Chargepoint argues that the IOUs should not have discretion to make “periodic changes” to the format of the metering data communication requirements unless they are justified, and only to the extent that the changes address clear problems. The IOUs are discouraged from periodically modifying the data format for the Minimal Transfer Requirement. The IOUs and MDMAAs shall consult with Energy Division prior to implementing any changes to the Minimal Transfer Requirement, which must improve the efficiency of data reporting between the IOUs and MDMAAs to warrant modification. However, since utilities were encouraged to develop and offer an Alternative Transfer Option that leverages existing standards<sup>56</sup>, it is reasonable to allow for periodic changes to the data format. No changes to the term are necessary.

*(c) Meter System Testing at page 13*

Chargepoint requests two modifications to this term. First, Chargepoint recommends that the third party evaluator’s (3PE) testing requirements be “subject to oversight by the Energy Division.” Per the Decision, Energy Division is already required to advise the 3PE per quarterly consultations.<sup>57</sup> In this regard, no changes are necessary.

Second, Chargepoint requests that all interested parties be invited to participate in the development of these requirements to avoid technical issues and disputes. The Decision requires that Submeter MDMAAs propose methodologies for testing and calibration for IOU review, consent, and subsequent implementation by the 3PE.<sup>58</sup> Chargepoint’s request is consistent with the Decision.

The IOUs shall change the meter system testing term to reflect that the Submeter MDMAAs will propose methodologies for testing and calibration for IOU review, consent, and subsequent implementation.

Chargepoint asserts that the “Submeter Manufacturer Certification and Accuracy” section is inconsistent with the Decision, which only requires 1) MDMA confirmation that it meets Energy Division’s standards and requirements

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<sup>56</sup> D.13-11-002, p. 31.

<sup>57</sup> D.13-11-002, p. 38.

<sup>58</sup> D.13-11-002, p. 33.



and 2) third party evaluator testing. As described above, the Decision requires that the Submeter MDMAs propose “methodologies and results for submeter testing and calibration” for IOU review.<sup>59</sup> Consistent with the Decision, the IOUs will review the MDMAs’ methodologies for submeter testing and calibration.

The IOUs shall review the MDMAs’ proposals to test and calibrate submeters as required by D.13-11-002.

### ***5. Data Reporting and Transfer Requirements***

As ordered in OP 2, of D.13-11-002, the IOUs included a data format template for transmitting data between the IOUs and MDMAs. These requirements are included in Attachment 2 to the Submeter MDMA Registration Agreement, Data Reporting and Transfer Requirements. It includes basic information needed for the utility to identify the account and submeter energy usage. No protests were received on the data format template. The proposed form is consistent with the requirements of the Decision.

The Data Reporting and Transfer Requirements are consistent with D.13-11-002.

### ***6. Preliminary Pilot Program Budget for each IOU***

As ordered in OP 3 of D.13-11-002, the IOUs included a Preliminary Pilot Program Budget for each IOU. The Commission considers parties’ protests as they relate to the budget. (a) Estimation of Preliminary Budget; (b) Compensation of Non-Recurring and Recurring Costs for Submeter MDMA; (c) Non-Compensation Terms Affecting Submeter MDMA; and (d) Availability of Commercial PEV Rates.

#### ***(a) Estimation of Preliminary Budget***

Protests related to utility pilot budgets focused on the overall funding level in the budgets and the incentive payment levels. We share GPI’s concern that the overall budget level appears high. In particular, the customer evaluation expense seems large. In aggregate, the utilities are proposing spending \$3 million for an evaluator that will be evaluating 1,500 customers and utility expenses associated with submetering. Pilots of similar scope have relied on much smaller budgets.

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<sup>59</sup> D.13-11-002, p. 33 and Attachment 1, p. 18.

For example, the evaluation for a solar water heating pilot program across 342 customers over three years in SDG&E's territory required a budget of \$429,320. While the maximum number of customers in the submetering pilot is 1,500, field tests are required only for up to 5% (375) of total meters participating.<sup>60</sup>

The IOUs shall reduce the budget for the Third Party Evaluator by \$2 Million to \$1,000,000 in aggregate across all three utilities.

*(b) Compensation of Non-Recurring and Recurring Costs for Submeter MDMAs*

Chargepoint argued for higher third party compensation, asserting that the payment level proposed by the IOUs does not fully cover their non-recurring cost to participate. The IOUs argued that there was "no established benefit to ratepayers," suggesting that fixed costs were not justified for compensation. If there were 'established benefits' to submetering, there would be no need to conduct pilots. Decision 11-03-007 identified several potential benefits from this pilot project. It is unclear how the Commission can evaluate these benefits without ensuring that third parties can participate in the pilot. Like other EPIC projects, this requires some method to pay third party costs that cannot reasonably be expected to generate revenue. Additionally, this pilot may benefit non-participating entities, including future customers and MDMAs, further justifying the inclusion of fixed costs in third-party compensation.

We also agree with the utilities that paying for the fixed costs of MDMA without using a competitive bidding mechanism, could result in "selective funding." Lacking an effective and timely way to evaluate third-party fixed costs, we are compelled to use the upfront incentive payment as a means to help defray all types of third-party costs associated with participating in this pilot. The IOUs should apply \$1.5 million of excess evaluator costs described above to increase the incentive payment. The remaining amount of excess evaluator funding should be eliminated from the budget.

The IOUs budget proposes providing MDMA with a \$200 customer acquisition payment and a \$10 monthly participation payment. ORA argued that the payment should be split between the customer and the MDMA. We agree that there are benefits to making more of the payment occur on monthly basis, as it reduces the incentive for MDMA to drop out before the pilot is complete.

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<sup>60</sup> D.13-11-002, p. 33.

The IOUs shall use the \$2 Million previously allocated to the Third Party Evaluator to provide the Submeter MDMA a one-time enrollment payment of no less than \$500 per customer and a \$33 per month payment for performing submetering data management and exchange responsibilities.

*(c) Non-Compensation Terms Affecting Submeter MDMA's*

The IOUs currently propose to pay the enrollment incentive within 60 days after each customer enrollment and to pay the monthly fee within 60 days after the end of each quarter.<sup>61</sup> Chargepoint argued that this is excessively long, resulting in high carrying costs for participants. ORA commented that payments should be made after three successful billing cycles for all participants enrolled to incentivize the MDMA to provide timely and accurate service. The Commission agrees with the IOUs that it is reasonable to pay the enrollment incentive within 60 days after the enrollment. However, we are compelled by the need to ensure that ratepayer funds only compensate MDMA's that appropriately complete their responsibilities. The IOUs shall pay the MDMA's the monthly incentive payment within 60 days of the first two successful billing cycles for a given customer, and within 30 days after successful billing cycles thereafter. The 60-day period will also allow the utility to verify that the participating MDMA is providing MDMA services while accommodating the needs for participating MDMA's.

The IOUs shall revise the terms to reflect the 60- and 30-day deadlines by which MDMA's must receive payment to ensure that the MDMA's are compensated for adequate performance.

*(d) Availability of Commercial PEV Rates*

Chargepoint identified the need to address rate design issues given that PG&E and SDG&E currently lack PEV-specific commercial rates to apply to submetered energy use. Since rate design is not in the scope of the pilots and is pending in concurrent proceedings, we will not require PG&E and SDG&E to develop commercial PEV rates for this pilot. Absent rate designs for PG&E and SDG&E's commercial customers, the IOUs were amenable to providing a flat payment of \$20/month per submeter that could expediently be applied to bills. We consider

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<sup>61</sup> Joint IOU Advice Letter, p. 5.

the maximum potential total cost associated with this payment to be reasonable in comparison to the budget requirements for the remainder of the phase 1 pilot.

PG&E and SDG&E shall revise the Customer Enrollment Agreement and Schedule PEVSP to include a flat \$20/month payment for customers on commercial time-of-use tariffs.

## ***7. Pilot Evaluation Process Timeline***

As ordered in OP 6, of D.13-11-002, the IOUs included a timeline for the submetering pilot program evaluation process. No parties protested the timeline, entitled Planning Details for Selection of EV Pilot Third Party Evaluator.

The Pilot Evaluation Process Timeline is reasonable given the requirements of D.13-11-002.

## **Consistency with the Zero-Emission Vehicles Action Plan**

Executive Order B-16-2012 set forth targets for the commercialization of zero-emission vehicles ("ZEV") to reduce emissions from the transportation sector by 80% by 2050. The ZEV Action Plan identifies specific strategies and actions that the state agencies will take to meet the milestones of B-16-2012. The Action Plan sets four broad goals to advance ZEVs, which include:

- (1) Complete needed infrastructure and planning,
- (2) Expand consumer awareness and demand,
- (3) Transform fleets, and
- (4) Grow jobs and investment in the private sector.

Under the second goal, the Action Plan identifies the CPUC as the lead agency to implement certain activities related to submetering. Specifically, the Action Plan requires the CPUC to:

Evaluate ways to reduce costs of PEV home charging, including creating a simpler metering option for homes with PEV chargers and establishing a sub-metering protocol or other policies to reduce costs for homeowners to access PEV-specific time of use rates.<sup>62</sup>

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<sup>62</sup> Office of Governor Edmund G. Brown, 2013 ZEV Action Plan: A Roadmap toward 1.5 Million Zero-emission Vehicles on California Roadways by 2025, p. 16.

Consistent with the Zero Emission Vehicles Action Plan, the submetering pilots ordered in D.13-11-002 tasks the IOUs and Submetering MDMAs to evaluate the use of submetering to reduce PEV charging and equipment costs by enabling access to customer-owned submeters and PEV-specific time of use rates.

## **Public Safety**

California Public Utilities Code Section 451 requires that every public utility maintain adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities to ensure the safety, health, and comfort of the public.

Schedule PEVSP Pilot requires that submeters meet Underwriters Laboratory (“UL”) safety requirements. All submeters used in the pilot, whether it is included as part of a device (such as an Electric Vehicle Supply Equipment) or is a stand-alone device are subject to this safety requirement.<sup>63</sup>

Based on the information before us, this tariff does not appear to result in any adverse safety impacts on the facilities or operations of the IOUs.

## **COMMENTS**

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

## **FINDINGS AND CONCLUSIONS**

1. Southern California Edison Company (“SCE”), Pacific Gas and Electric Company (“PG&E”), and San Diego Gas and Electric Company (“SDG&E”) respectively filed Advice Letter (“AL”) 42343-E, 2993-E, and 2566-E on January 21, 2014, in which it requested approval of Schedule PEVSP to implement pilots to demonstrate Plug-In Electric Vehicle Submetering. The Joint Advice Letter received four timely protests from ChargePoint, Glen Canyon, Green Power Institute/Community Environmental Council, and

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<sup>63</sup> Performance Standards for Metering and Meter Data Management Agents, Section 1.C.

Marin Clean Energy. The Joint Advice Letter received a response from the Office of Ratepayer Advocates. Protests and responses were timely filed on February 10, 2014. The Joint Investor Owned Utilities and PG&E filed a timely reply on February 18, 2014.

2. Schedule PEVSP requires the following modifications to conform to the requirements of D.13-11-002. The IOUs shall:
  - i. Allow participation by Community Choice Aggregator customers.
  - ii. Notify the customer if submetering service is terminated and allow them to complete the remainder of their Pilot Participation Period subject to completing the requirements to re-enroll with an alternative provider.
  - iii. Based on more recent adoption levels and in order to contain costs, reduce the limit on NEM customer participation to 10% (150) of total eligible submeters.
  - iv. Correct the length of the Enrollment Period to 6 months page 3.
  - v. Allow 10 days for an MDMA to report a drop-out or change of address, and include an option that allows customers who change their address to continue in the pilot.
  - vi. Extend pilot eligibility to Direct Pay Plan customers.
  - vii. Remove the reference on page 4 to “utility specific safety requirements” for submeters, and instead only reference UL safety requirements.
  - viii. Eliminate the limit of 5 submeters per primary meter.
  - ix. The IOUs shall collaborate with the MDMAs to determine an appropriate method for validating, editing, and estimating interval data, building on the Strawman PEVSP where possible, as required by D.13-11-002.
  - x. Amend the definition of primary meter by replacing “the premise” with “the Customer’s account.”
  - xi. Amend the definition of ‘Submeter Billed Amount’ by replacing “Summary Bill” with “summary of charges related to submetered usage.”
3. The Customer Enrollment Agreement requires modifications to conform to the requirements of D.13-11-002. The IOUs shall:
  - i. Include Chargepoint’s suggested language to describe the customer’s experience during survey testing by adding the following bolded language to the description of the survey experience: “...In addition, you agree to

provide an independent evaluator paid by the Investor owned Utilities (IOUs) with feedback on your experiences with Pilot participation, including enrollment, equipment installation, and billing. **In accordance with the CPUC's instruction, this survey will not be burdensome.** Additionally, you may be required to provide access to your home or facility for the evaluator to perform tests on your submeter. **Such submeter testing is only required of 5% of participating customers. If your submeter is selected for testing, tests will be arranged at a convenient time, and your MDMA may be present...."**

- ii. Revise the references on page 2 to submeter installation to allow for the possibility of a subcontractor situation.
  - iii. Change page 3 to allow termination due to late or incomplete data to only occur in cases where the MDMA's action is the cause of the data transmission failure.
  - iv. Change the eligibility terms on page 4 to limit pilot participation only in cases where customers are participating in utility programs that would prevent the completion of subtractive billing.
  - v. Revise page 4 to remove the suggestion that customers search the IOU website to determine their participation in the pilot.
  - vi. Revise steps 2-4 of the enrollment process to correctly reflect that the MDMA is responsible for enrolling customers, that customers need not call the IOU to enroll and that EVSE installation will be unnecessary for customers that already have EVSE installed. Chargepoint's recommendations are consistent with Decision 13-11-002.
  - vii. The IOU may elect to provide non-discriminatory assistance to MDMA's in order to identify PEV customers under two conditions: (1) The IOU maintains its existing obligations to protect customer privacy; and (2) The costs associated with identifying and transmitting this information to MDMA's are de minimis.
4. The Submeter MDMA Registration Agreement requires modifications to conform to the requirements of D.13-11-002. The IOUs shall:
- i. Replace "IOU standards" on page 2 to indicate that the performance standards are "Energy Division standards."

- ii. Indicate that Energy Division will review the applications to maintain impartiality and consistency for MDMAs operating in multiple IOU territories, and consult with the IOUs if necessary.
  - iii. Change the testing and calibration requirements for MDMAs on page 4 to clarify that the Independent Evaluator and Submetering MDMA may obtain access from their participants for testing and calibration, if selected as part of the evaluation.
  - iv. Add Chargepoint's suggested modification to the language of the utility release of liability on page 4, adding following language to the end of the last sentence in the Indemnification section: "...provided such Utility action is consistent with applicable CPUC orders, tariffs and regulations."
5. The Performance Standards for Metering and Meter Data Management Agents require modifications to conform to the requirements of D.13-11-002. The IOUs shall:
- i. Change transfer testing requirements on page 11 to clarify that transfer testing occurs during the Submeter MDMA Registration Process and thereafter as necessary.
  - ii. Change the meter system testing term to reflect that the Submeter MDMAs will propose methodologies for testing and calibration for IOU review, consent, and subsequent implementation.
  - iii. The IOUs shall review the MDMAs' proposals to test and calibrate submeters as required by D.13-11-002. The Data Reporting and Transfer Requirements are consistent with D.13-11-002.
6. Schedule PEVSP and other supporting agreements require modifications to conform to the requirements of D.13-11-002 and to reflect changes to the Preliminary Pilot Program Budget for each IOU. The IOUs shall:
- i. Reduce the budget for the Third Party Evaluator by \$2 Million to \$1,000,000 in aggregate across all three utilities.
  - ii. Use the \$2 Million previously allocated to the Third Party Evaluator to provide the Submeter MDMA a one-time enrollment payment of no less than \$500 per customer and a \$33 per month payment for performing submetering data management and exchange responsibilities.



- iii. Revise the terms to reflect the 60- and 30-day deadlines by which MDMAs must receive payment to ensure that the MDMAs are compensated for adequate performance.
  - iv. PG&E and SDG&E shall revise the Customer Enrollment Agreement and Schedule PEVSP to include a flat \$20/month payment for customers on commercial time-of-use tariffs.
- 7. The Pilot Evaluation Process Timeline is reasonable given the requirements of D.13-11-002.
  - 8. Consistent with the Zero Emission Vehicles Action Plan, the submetering pilots ordered in D.13-11-002 tasks the IOUs and Submetering MDMAs to evaluate the use of submetering to reduce PEV charging and equipment costs by enabling access to customer-owned submeters and PEV-specific time of use rates.
  - 9. Based on the information before us, this tariff does not appear to result in any adverse safety impacts on the facilities or operations of the IOUs.

**THEREFORE IT IS ORDERED THAT:**

- 1. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas and Electric Company implement the submetering pilots ordered in D.13-11-002 through Schedule Plug-In Electric Vehicle Submetering Pilot and the associated agreements, as modified herein.
- 2. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas and Electric Company shall file Tier 1 Advice Letters revising Schedule Plug-In Electric Vehicle Submetering Pilot and associated agreements according to the modifications herein within 14 days of the effective date of this resolution.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on June 12, 2014; the following Commissioners voting favorably thereon:

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Paul Clanon  
Executive Director